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8 **UNITED STATES DISTRICT COURT**  
9 **NORTHERN DISTRICT OF CALIFORNIA**  
10 **OAKLAND DIVISION**  
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12 LAURI VALJAKKA,

13 *Plaintiff,*

14 v.

15 NETFLIX, INC.,

16 *Defendant.*

Case No. 4:22-cv-01490-JST

**[PROPOSED] ORDER GRANTING  
ADMINISTRATIVE MOTION TO FILE  
DOCUMENTS UNDER SEAL  
[SUPPLEMENTAL BRIEF REGARDING  
EXPENSES AND FEES PURSUANT TO  
ECF NO. 324]**

On September 2, 2025, Defendant Netflix, Inc. (“Netflix”) filed an Administrative Motion to File Documents Under Seal (“Motion to Seal”) relating to its Supplemental Brief regarding Expenses and Fees Pursuant to ECF No. 324, which is narrowly tailored to seal only the sealable material, pursuant to Local Rules 7-11 and 79-5. Netflix lists in the table below each document or portion thereof that it seeks to seal.

The Court, having reviewed the evidence in support of the Motion to Seal, finds that the following documents constitutes sealable material under Local Rule 79-5:

Document	Entirety Or Redacted	Designating Party	Court’s Ruling
Declaration of Sarah E. Piepmeier in Support of Netflix’s Supplemental Brief.	Highlighted Redactions: <ul style="list-style-type: none"> <li>• 3:12-13;</li> <li>• 4:2-3;</li> <li>• 4:23-24;</li> <li>• 5:9; and</li> <li>• 6:8-21.</li> </ul>	Netflix (with its outside counsel Perkins Coie and Baker Botts)	
Exhibits 1-2 to the Declaration of Sarah E. Piepmeier in Support of Netflix’s Supplemental Brief.	Highlighted Redactions on the Following Pages Exhibit 1: 2, 4-5, 10-12, 16-18, 23-25, 30-32, 35-37, 39-41, 44. Exhibit 2: 2-3.	Netflix (with its outside counsel Perkins Coie)	
Declaration of Rachael Lamkin in Support of Netflix’s Supplemental Brief.	Highlighted Redactions: <ul style="list-style-type: none"> <li>• 3:4-5;</li> <li>• 3:14-15;</li> <li>• 3:23-24;</li> <li>• 4:4-5;</li> <li>• 4:13-14;</li> <li>• 4:22-23;</li> <li>• 5:4-5;</li> <li>• 5:14-15; and</li> <li>• 6:15.</li> </ul>	Netflix (with its outside counsel Baker Botts)	
Exhibits 1-3 to the Declaration of Rachael Lamkin in Support of Netflix’s Supplemental Brief.	Highlighted Redactions on the Following Pages: Exhibit 1: 2, 8-9, 12-13, 28-29, 33-34, 38-39, 43-44, 62-63,	Netflix (with its outside counsel Baker Botts)	

Document	Entirety Or Redacted	Designating Party	Court's Ruling
	66-67, 75-76, 79-80, 90-91, 95-96, 101-102, 105. Exhibit 2: 2-6. Exhibit 3: 2-3, 5-6.		

Therefore, IT IS HEREBY ORDERED that Defendant Netflix's Administrative Motion is GRANTED. The unredacted versions of the Declaration of Sarah E. Piepmeier in Support of Netflix's Supplemental Brief, designated exhibits thereto, the Declaration of Rachael Lamkin in Support of Netflix's Supplemental Brief, and designated exhibits thereto, shall be filed under seal pursuant to L.R. 79-5(c).

**IT IS SO ORDERED.**

Dated: \_\_\_\_\_, 2025

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Hon. JON S. TIGAR  
DISTRICT COURT JUDGE